

HUSCH BLACKWELL

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**HB Complaint
Exhibit B**

May 7, 2019

VIA E-MAIL [parp@wmata.com]

Washington Metropolitan Area Transit Authority
Office of General Counsel – 2nd Floor
Attn: PARP/Privacy Administrator
600 Fifth Street, NW
Washington, DC 20001-2610

Re: PARP Records Request

Dear PARP/Privacy Administrator:

This is a request under WMATA's Public Access to Records Policy P/I No. 9.3/0 (PARP) for records relating to Phase II of the Dulles Silver Line Extension project.

We request the following records:

All reports, memoranda, presentations, and other similar documents completed after June 1, 2018 that reflect or summarize the results of testing, evaluation, analysis, or assessment of the concrete turnout ties installed on the Phase II Dulles Silver Line Extension project.

We are prepared to pay reasonable standard search and copying charges necessary to respond to this request in accordance with the PARP, but please notify me in advance if the fees are expected to exceed \$500. *See* PARP § 7.4. In order to expedite this request and to minimize the charges, we request that you produce the records in electronic format to the extent possible. If records responsive to this request are available only in hard copy or production is not feasible, please provide the name and telephone number of the person that we may contact to arrange for inspection of the records. *See id.* § 7.9.1(b)(ii).

If you determine that any records or portions of records are exempt from disclosure, we request a *Vaughn* index containing a detailed justification of the grounds for nondisclosure of each withheld portion of requested material. *See Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), *cert. denied*, 415 U.S. 977 (1974).

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Thank you for your attention to this request.

Very truly yours,

HUSCH BLACKWELL LLP

A handwritten signature in blue ink, appearing to read "Brian Waagner", is written over the printed name.

Brian P. Waagner